

1 KELLY LITIGATION GROUP, INC.
2 RICHARD KELLY, ESQ. (SBN 154504)
3 MICHAEL MENGARELLI, ESQ. (215000)
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5 Burlingame, CA 94010
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8 Attorneys for Petitioners,
9 WILLIAM MICHAEL WAGNER & JAN SONNEMAN, AND
10 RICHARD ELLISON

11
12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 In re
16 ACEH CAPITAL, LLC,
17 Debtor.

Case No.: 21-30299 DM

Chapter 7

**DECLARATION OF JAN SONNEMAN
IN SUPPORT OF MOTION &
APPLICATION FOR TURNOVER
RELIEF EFFECTING INTEREST IN
REAL PROPERTY**

If No Opposition, No Hearing Necessary

**Judge: DENNIS MONTALI
U.S. Bankruptcy Judge**

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22 TO: THE COURT and ACEH CAPITAL, LLC by and through U.S. Bankruptcy
23 Trustee, E. Lynn Schoenmann and counsel Aron M. Oliner, Esq., and Geoffrey A. Heaton,
24 Esq.; and Jay D. Crom, Esq., and Eric A. Nyberg, Esq. for ACEH CAPITAL, LLC:

25 I, JAN SONNEMAN, declare as follows:

- 26 1. I am a resident of Redwood City, CA and am an adult person over the age of 18 and
27 competent to testify about the facts stated herein if so called to do so.
28 2. I am a married woman and my husband is William Michael Wagner.

1 3. I am a 30% joint tenant owner with my husband, William Michael Wagner, in the
2 following Property located at 36th STW VIC Ave. F6 in Lancaster, County of Los
3 Angeles with APN 3107-003-004 with the following legal description:

4 ALL THAT CERTAIN REAL PROPERTY SITUATED IN THE CITY OF LANCASTER,
5 COUNTY OF LOS
6 ANGELES, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

7 PARCEL 8, IN THE CITY OF LANCASTER, COUNTY OF LOS ANGELES, STATE OF
8 CALIFORNIA, AS
9 SHOWN ON RECORD OF SURVEY MAP FILED IN BOOK 66, PAGES 27 AND 28 OF
10 RECORD OF SURVEYS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID
11 COUNTY.

12 EXCEPT THEREFROM ONE-FOURTH INTEREST IN AND TO ALL MINERALS, OIL,
13 GAS, AND OTHER
14 HYDROCARBON SUBSTANCES IN AND UNDER SAID LAND, WITHOUT RIGHT
15 OF ENTRY, AS RESERVED BY WARREN O. WAGNER AND ROSE MARIE
16 WAGNER, HUSBAND AND WIFE, BY DEED RECORDED FEBRUARY 1, 1955 AS
17 INSTRUMENT NO. 208, OFFICIAL RECORDS.

18 **APN: 3107-003-004.**

19 4. That as co-owner with Richard V. Ellison, I am aware that ACEH Capital LLC through
20 its related business ACE Capital Group, wrote to Mr. Ellison admitting an 'error' and
21 'mistake' with regard to Mr. Ellison's 25% in the Los Angeles County Records.

22 5. In November 2002, ACEH Capital wrote to my husband with copy to Mr. Ellison
23 denoting "As you know ACEH Capital is no longer a co-owner on the referenced parcel
24 of land of which you are the majority interest holder." Attached hereto is a true and
25 correct copy of the 2002 letter I read am aware of because my husband received it.

26 6. That I have retained Mr. Kelly to try to resolve this matter amicably but that an
27 agreement could not be reached for the Trustee on behalf of ACEH Capital, LLC to
28 correct the title issues back in the name of Richard V. Ellison; requiring this motion.
As the co-owner of this property with a joint 30%, I consent to the court's issuing of
an order correcting the error and putting listed title back into Richard Ellison's name.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing facts and attached documents are true and correct.

3 Dated: October 1, 2021

4 By: /s/ Jan Sonneman
5 JAN SONNEMAN
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1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing facts and attached documents are true and correct.

3 Dated: September 7, 2021

4 By: 
5 JAN SONNEMAN
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